

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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TRUSTEES OF THE STRUCTURAL STEEL AND
BRIDGE PAINTERS OF GREATER NEW YORK
EMPLOYEE TRUST FUNDS and TRUSTEES OF
THE DISTRICT COUNCIL 9 PAINTING
INDUSTRY INSURANCE AND ANNUITY FUNDS,

DOCKET NO. 08 civ 3403 (SCR)

ANSWER TO DEFENDANT'S
COUNTERCLAIM

Plaintiffs,

-against-

GEORGE CAMPBELL PAINTING CORP. and
FEDERAL INSURANCE COMPANY,

Defendants.
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Plaintiffs, Trustees of the Structural Steel and Bridge Painters of Greater New York Employee Trust Funds and Trustees of the District Council 9 Painting Industry Insurance and Annuity Funds (Hereinafter referred to as "Funds") by its attorneys Barnes, Iaccarino, Virginia, Ambinder & Shepherd, PLLC, as and for its Answer to Defendant, Federal Insurance Company's Answer with Counterclaim in the above captioned action, states upon information and belief, as follows:

1. Plaintiff Funds deny knowledge or information sufficient to form a belief as to any of the allegations contained in paragraph "97" of defendants Answer with Counterclaim and Cross-Claims.
2. Plaintiff Funds deny each and every allegation contained in paragraph "98" of defendant's Answer with Counterclaim and Cross-claims except admits that plaintiff included in the instant action against Federal fringe benefits or contributions relating to contracts or projects .
3. Plaintiff Funds deny each and every allegation contained in paragraph "99" of defendant's Answer with Counterclaim and Cross-claims.

4. Plaintiff Funds deny each and every allegation contained in paragraph "100" of defendant's Answer with Counterclaim and Cross-claims.

5. Plaintiff Funds deny each and every allegation contained in paragraph "101" of defendant's Answer with Counterclaim and Cross-claims.

6. Plaintiff Funds deny each and every allegation contained in paragraph "102" of defendant's Answer with Counterclaim and Cross-claims.

7. Plaintiff Funds deny each and every allegation contained in paragraph "103" of defendant's Answer with Counterclaim and Cross-claims.

WHEREFORE, the plaintiffs respectfully pray that defendant, Federal Insurance Company's Counterclaim herein be dismissed.

Dated: Elmsford, New York
July 10, 2008

BARNES, IACCARINO, VIRGINIA
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